

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)

In re

Michael T. Petit

Debtor.

Bankruptcy Case No.:

14-25546-DER

Chapter 7

UNITED STATES TRUSTEE=S MOTION
TO EXTEND TIME TO OBJECT TO DISCHARGE

The United States Trustee for Region Four, which includes the District of Maryland, in furtherance of the administrative responsibilities imposed pursuant to 28 U.S.C. ' 586(a), respectfully moves, pursuant to Rule 4004(b) of the Federal Rules of Bankruptcy Procedure, for an order extending the time to file a complaint objecting to the discharge of the debtor, and as grounds therefor, states as follows:

1. On October 8, 2014, Michael T. Petit (the ADebtor@) filed a voluntary petition under Chapter 7 of the Bankruptcy Code.
2. The time for filing a complaint objecting to Debtor=s discharge pursuant to 11 U.S.C. ' 727 expires on January 16, 2015. (See Fed. R. Bankr. P. 4004(a); Doc. 8.)
3. It has come to the United States Trustee=s attention that a later chapter7 case was filed, on November 12, 2014, by OpenAmplify, LLC (#14-27416), an entity in which the Debtor testified at the meeting of creditors on January 5, 2015, that he was a manager.
4. Furthermore, Debtor indicates in his papers that he owns an interest in an entity known as Engageable, LLC, which upon information and belief, was incorporated by the Debtor in Florida on July 15, 2014, and which carries out the same sort of business in which Debtor was engaged with OpenAmplify, LLC.

5. In his sworn schedules, Debtor listed his interest in Engageable, LLC at a value of \$1, and exempted the \$1 value of his interest.

6. The U.S. Trustee needs additional time to evaluate the Debtor's interest in, and connections among, the Debtor, OpenAmplify, LLC, and Engageable, LLC. These circumstances require further investigation in order to determine if there are grounds for objecting to the Debtor's discharge under section 727.

7. Accordingly, good cause exists for the extension of the deadline to file a complaint objecting to discharge for a period of approximately ninety (90) days to April 17, 2015.

8. Pursuant to Local Bankruptcy Rule 9013-2, the United States Trustee states that she is not filing a memorandum of law in support of this motion.

WHEREFORE, the United States Trustee respectfully requests that this Court enter an Order:

- (a) Granting this Motion;
- (b) Extending the deadline to file an objection to discharge pursuant to 11 U.S.C. § 727 for all parties in interest by approximately ninety (90) days to and through April 17, 2015;
- (c) Granting such other and further relief as this Court deems just and proper.

Respectfully submitted
Judy A. Robbins
United States Trustee, Region Four

Date: January 14, 2015

By: /s/ Edmund A. Goldberg
Edmund A. Goldberg (Fed. Bar No. 08943)
Trial Attorney
United States Department of Justice
101 W. Lombard Street, Suite 2650
Baltimore, MD 21201
(410) 962-4300

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 14th day of January, 2015, a copy of the foregoing Motion was mailed first-class, postage prepaid to:

Michael T. Petit, 550 Okeechobee Blvd., Unit 320, West Palm Beach FL 33401 (Debtor, appearing *pro se*;

I HEREBY FURTHER CERTIFY that on January 14, 2015, I reviewed the Court=s CM/ECF system and an electronic copy of this motion should be provided to:

George W. Liebmann, Trustee, Griebmann@lspa.comcastbiz.net.

/s/ *Edmund A. Goldberg*

Edmund A. Goldberg

